

## **Best Management Practices for Mercury Switch Collection and Consolidation Sites**

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These best management practices (BMPs) are only suggestions to help businesses that collect and consolidate mercury switches on how to comply with the mercury switch regulations. These BMPs do not supersede any federal, state, or local regulations.

### **BMPs for Receiving Mercury Switches:**

One good way to reduce disposal costs is by partnering with other businesses and establishing a collection point where the mercury switches are consolidated and picked up by a licensed waste hauler. This way several businesses can share the cost for the disposal of mercury switches.

Here are a few suggestions for accepting/receiving mercury switches from offsite sources:

- Leaking mercury switches that are not securely sealed inside sealable plastic bags are likely to release mercury onto the other switches that are in the same container. Here are some things you should consider if you receive a container of mercury switches, and it looks like some of the switches are leaking mercury:
  - Transfer all of the switches into sealable plastic bags.
  - Place the bagged switches inside another secured container.
  - Manage these switches as universal waste.
  - Manage the contaminated shipping container as hazardous waste.
- Containers, such as liquor bottles and soda cans, should not be used to hold mercury. Whenever possible, get the name, address and phone number of anyone who ships mercury inside these containers. Report this information to the Department of Toxic Substances Control (DTSC) or Certified Unified Program Agency (CUPA). DTSC or CUPA will instruct you on how to manage these materials.
- You can reject any shipment of mercury switches you receive. You must, however, notify the sender. You can either ship the switches back to the sender or to a destination facility.
- If you receive mercury switches from an unknown party, record the quantity of mercury switches that you received and record that it was from an unknown party. You can manage the mercury switches together with the other switches as long as they are properly packaged or not leaking.

## **BMPs for Storing Mercury Switches:**

You can keep the mercury switches you receive in their original shipping containers as long as the containers are:

- Properly labeled;
- Secured;
- Structurally sound;
- Compatible with mercury; and
- Packed with packing materials adequate to prevent the mercury switches from breaking during storage, handling and transport.

You can also transfer the mercury switches from their shipping containers and into your own storage container. A good place to store mercury switches is in a properly labeled container that has a tight-fitting lid, such as a plastic 5-gallon bucket, or a plastic-lined 55-gallon drum.

You can label the container ***“Universal Waste – Mercury Switches.”***

You can store the mercury switches with the casing; however, it only adds unnecessary bulk. Removing the switches from the casing saves space and money because most waste haulers charge a flat fee that is based on the size of the container. After you remove the mercury switch you can handle the casing or light assembly as non-hazardous waste.

You can store the mercury switches for up to 1 year after you receive them. You can keep track of this by placing the accumulation start date on the storage container.

## **BMPs for Shipping Mercury Switches:**

Whenever you are ready to ship the mercury switches for offsite recycling, it is a good idea to hire a licensed hazardous waste hauler. Some destination facilities that recover and recycle mercury also offer pick-up services.

It is a good idea to use packing material, such as bubble-wrap or packaging peanuts, to pack the empty space inside the container and secure the mercury switches during transport.

## **BMPs for Recording and Tracking Mercury Switches:**

Keeping all records, including shipping and receiving records, in a central file will make it easier to maintain and organize the records.

Keeping and maintaining a log in either a notebook or computer is a good way to comply with the recordkeeping requirements of the regulations. Here is an example of a log sheet:

<b>Date Mercury Switches Sent/Received</b>	<b>Quantity of Mercury Switches Shipped/Received</b>	<b>Sender's Contact Information</b>	<b>Receiver's Contact Information</b>
4-15-05	1 pound of mercury switches	John Doe John's Auto Salvage 5555 Something Rd Anytown, CA 98765	Jack Doe Bob's Auto-wrecking 1234 Somewhere Street Anytown, CA 98765
4-22-05	0.5 pound of mercury switches	John Doe John's Auto Salvage 5555 Something Rd Anytown, CA 98765	Jack Doe Bob's Auto-wrecking 1234 Somewhere Street Anytown, CA 98765

## **Safe Practices for Handling Mercury Switches**

Make sure that employees handling mercury switches have been informed of proper waste mercury handling and emergency response procedures.

Here are some ideas that can be part of a mercury spill cleanup system:

- Have an emergency plan in place that provides proper response procedures and emergency contact information for accidental mercury spills and releases; and
- Keep a mercury spill kit in an easily accessible area.

Here are some suggestions for safely handling mercury switches:

- Use personal protective equipment like gloves and safety glasses when handling mercury switches;
- Handle mercury switches in areas where accidental spills can easily be contained and properly cleaned; and
- Store labeled mercury switch containers in designated and securable areas away from heavy traffic.